

Dan R. Larsen #4865
Christopher J. Martinez #11152
Dorsey & Whitney LLP
Kearns Building
136 South Main Street, Suite 1000
Salt Lake City, UT 84101-1685
Telephone: (801) 933-7360
Attorneys for Defendant Ford Motor Company

UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

LINDA SMITH, as Personal Representative on behalf of the Legal Heirs of RONNIE SMITH, Deceased, , Plaintiff, vs. FORD MOTOR COMPANY, et al., , Defendants.	FORD MOTOR COMPANY’S DAUBERT MOTION TO EXCLUDE EXPERT TESTIMONY OF SAMUEL HAMMAR, M.D. Case No. 2:08-cv-00630DB Judge Dee Benson
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Pursuant to Rule 702 of the Federal Rules of Evidence, defendant Ford Motor Company moves to preclude plaintiff from introducing evidence or testimony through his expert, Dr. Samuel Hammar, that “every exposure” to asbestos-containing automotive friction products causes mesothelioma. The bases for this motion are that Dr. Hammar’s methodology behind this opinion does not meet the *Daubert* standard and lacks scientifically reliable support.

This Motion is supported by a contemporaneously filed memorandum.

DATED this 8th day of August, 2012.

Dorsey & Whitney, LLP

By /s/ Dan R. Larsen

Dan R. Larsen
Christopher J. Martinez
Attorneys for Defendant Ford Motor Company

CERTIFICATION OF SERVICE

The undersigned certifies that on this 8th day of August, 2012, the foregoing was served on all counsel of record via the electronic service-ECF system.

/s/ Dan R. Larsen